

## Swiss Re Modern Slavery Act Transparency Statement

This statement is made on behalf of the Swiss Re group of companies (the **Swiss Re Group**) pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Swiss Re Group's slavery and human trafficking statement for the financial year ending 31 December 2019. This statement sets out the steps that the Swiss Re Group has taken and is taking to ensure that slavery and human trafficking are not taking place in any of its supply chains or in any part of its own business.

### The Swiss Re Group

The Swiss Re Group is a leading wholesale provider of reinsurance, insurance and other insurance-based forms of risk transfer. Dealing directly and working through brokers, our global client base consists of insurance companies, mid-to-large-sized corporations, public sector clients, and retail customers. Our operating segments comprise Reinsurance, offering traditional reinsurance solutions, insurance-linked securities and other insurance-related capital market products in both the Property & Casualty and Life & Health sectors; Corporate Solutions, providing insurance capacity to mid-sized and large multinational corporations; and Life Capital, our primary life and health business, which includes iptiQ, elipsLife, and the ReAssure business in the UK. Headquartered in Zurich, Switzerland, Swiss Re has operations at over 80 office locations in more than 30 countries. For more information about the Swiss Re Group, and for a list of Swiss Re's significant subsidiaries and businesses, please see our [2019 Annual Financial Report](#).

### Our commitment to sustainability

Swiss Re has a long-standing commitment to corporate responsibility and supporting sustainable progress. Swiss Re complies with the UN Guiding Principles on Business and Human Rights (known as the Ruggie Framework) and is a signatory to the UN Global Compact. We are also signatories to the UN-supported Principles for Responsible Investment and to the United Nations Principles for Sustainable Insurance. This web of ethical principles informs our [Group Code of Conduct](#), which guides Swiss Re employees in making responsible decisions and achieving results using the highest ethical standards.

We also recognise that espousal of human rights, labour standards and environmental protection is crucial for responsible business and sustainable development, and so of long-term benefit to the re/insurance industry. Our [Sustainability Risk Framework](#) embeds the twin principles of respect for human rights and protection of the environment into all elements of our business. Our Group Executive Committee further embedded these principles into the Swiss Re Group's operations by adopting an enhanced Group Sustainability Strategy in 2019. To learn more about our commitment to sustainability, the Group Sustainability Strategy, and the actions we have taken to put this commitment into practice, please see our 2019 [Sustainability Report](#) and the [Sustainability](#) section of our website.

### Our policies in practice

#### Our employees

Our Code of Conduct requires Swiss Re to promote a diverse and inclusive environment where everyone is treated with respect, free from discrimination and harassment. We are committed to fair and equal treatment, and provide equal opportunity for all individuals, regardless of age,

race, ethnicity, nationality, gender, religion, sexual orientation, disability or any other class protected by law.

Recruitment of all employees by Swiss Re is conducted in accordance with our Global Standard on Recruitment. This requires all applicants to undergo formal pre-screening for review of their eligibility, work permits and completeness of documents. All Swiss Re employees are employed by mutual agreement through a written contract governed by local law and terminable by either party.

All employees and candidates have access to an externally-hosted Whistleblowing Hotline to report suspicions of misconduct openly and anonymously. The Hotline is accessible by phone or via a website, both of which are operated by an independent service provider. All reports are treated in confidence, and Swiss Re maintains a zero-tolerance policy regarding retaliation against any individual reporting in good faith.

### **Our supply chain and procurement processes**

To run our operations we procure a wide range of goods and services, and we recognise and mitigate the supply chain risk that exists where our suppliers do not apply national or international legal and regulatory standards, or do not follow the principles set out in the UN Global Compact. The principles of the UN Global Compact are incorporated into our Code of Conduct by reference, and specifically cover our relationships with external service providers under the headings of human rights, labour conditions, environmental impact and anticorruption. The procurement of all goods and services from external vendors is conducted in accordance with our Group Sourcing Standard, which also incorporates these headings from the UN Global Compact. When selecting goods and services, we examine whether they comply with these requirements as part of the overall evaluation process. We review existing strategic suppliers in periodic contract reviews, and we visit individual suppliers to inspect them onsite. Internally, we hold regular awareness training on the principles of our Code of Conduct with all our sourcing staff.

We take a multi-layered and integrated approach to sustainable supply chain management, using collaborative platforms provided by multiple external providers to assess and screen suppliers and supply networks against corporate social responsibility criteria. The methodologies developed by these platforms explicitly incorporate human rights compliance due diligence, including screening for use of child and forced labour, and human trafficking. We use these platforms across all sourcing categories, and aim to have all tier 1 and tier 2 vendors (who account for approximately 80% of our outsourced spending) assessed by the end of 2020.

### **Our clients and business transactions**

Our Sustainability Risk Framework specifies criteria that may lead us to exclude a company from our re/insurance transactions or investments. These criteria include human rights violations, forced labour and slavery. All relevant employees have access to a Sensitive Business Risk Assessment Tool which analyses business transactions in respect of the Sustainability Risk Framework criteria. The tool cross-references the supplied information against internal risk registers and external data sources to calculate a sensitivity rating, and to supply a recommendation to either abstain from the transaction, refer the transaction for further analysis or mitigation, or proceed. Swiss Re also excludes certain countries from its business that have particularly poor human rights records. We review and update this list annually based on independent human rights assessments.

## **Our investments and acquisitions**

Swiss Re invests its assets responsibly via a controlled and structured investment process, integrating ESG criteria across the entire portfolio. As part of that, we consider better ESG rated companies for our listed equity and corporate bond investments. Furthermore, we apply the principles of the Sustainability Risk Framework to all our investments, which may lead to the exclusion of a company or a country from Swiss Re's investment scope.

All of our investments by acquisition include due diligence conducted in accordance with our Code of Conduct, including pre-transaction screening, integrity checks by external advisers and legal due diligence in order to identify and assess ESG, legal and regulatory risks. At more advanced stages of the due diligence process, our investment teams work with Group Risk Management and Compliance functions to perform sensitive business risk, political risk and compliance assessments. To learn more about our investing approach, please see the [Responsible Investing in Practice](#) section of our website.

## **Our action against money laundering and financial crime**

An aspect specifically relevant to financial service providers in the context of human trafficking is the link to money laundering, which is often associated with organised crimes that generate profits in cash such as people trafficking. Swiss Re has developed a Global Anti-Money Laundering Programme to ensure compliance with Anti-Money Laundering and Counter-Terrorist Financing (AML) laws. The Programme includes risk-based counterparty due diligence and screening (for both sourcing and re/insurance counterparties), risk-based transaction monitoring, screening against AML watchlists, mandatory AML training for all employees, designated group and regional money laundering reporting officers, a requirement for all employees to report illegal, suspicious or unusual activity to their money laundering reporting officer, reporting of AML and terrorist financing suspicions to relevant authorities, internal and independent reviews and audits to test the design and effectiveness of our AML framework, and a whistleblowing hotline for anonymous reporting. Swiss Re also adheres to the Recommendations of the Financial Action Taskforce, the leading international organization in the fight against money laundering and terrorist financing.

## **Approval**

The Board of Directors of Swiss Re Ltd approved this statement at its meeting of 18 March 2020.



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Walter B. Kielholz  
Chairman of the Board of Directors  
Swiss Re Ltd



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Tava Madzinga  
Country President, United Kingdom